

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CANDY M. SOUSA, on Behalf of Herself and All
Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION, JOHN E.
BAGALAY, JR., STEVEN K. SPRAGUE, and
GERARD T. FEENEY,

Defendants.

04 CV 30022 (MAP)

[Additional Captions Below]

**MOTION OF THE GABRIELE PROPOSED LEAD PLAINTIFFS FOR
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS PURSUANT TO
§21D(a)(3)(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND
APPROVAL OF SELECTION OF CO-LEAD AND LIAISON COUNSEL**

YOSEF STREICHER, on Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION, JOHN E.
BAGALAY, JR., STEVEN K. SPRAGUE, and
GERARD T. FEENEY,

Defendants.

ALVIN CHESS, Individually, and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

STEVEN K. SPRAGUE, GERARD T. FEENEY,
and WAVE SYSTEMS CORPORATION,

Defendants.

MICHAEL VICKER, on Behalf of Himself and
ll Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION, JOHN E.
BAGALAY, JR., STEVEN K. SPRAGUE, and
GERARD T. FEENEY,

Defendants.

04 CV 30026 (MAP)

04 CV 30037 (MAP)

04 CV 30040 (MAP)

H. MARTIN BOHMAN, on Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION, JOHN E.
BAGALAY, JR., STEVEN K. SPRAGUE, and
GERARD T. FEENEY,

Defendants.

04 CV 30041 (MAP)

JIMMY SUO, on Behalf of Himself and All Others
Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION, STEVEN K.
SPRAGUE, and GERARD T. FEENEY,

Defendants.

04 CV 30042 (MAP)

JACK SCHULMAN, Individually, and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION, STEVEN K.
SPRAGUE, and GERARD T. FEENEY,

Defendants.

04 CV 30043 (MAP)

Movants, as defined in the accompanying Memorandum of Law, upon the Declaration of Aaron Brody, dated April 1, 2004, and the exhibits annexed thereto, the accompanying Memorandum of Law, all of the prior pleadings and proceedings had herein, and such other evidence as the Court may consider at the hearing on this motion, hereby respectfully move this Court for an order in the form filed herewith: (i) consolidating the above-referenced actions; (ii) appointing the Gabriele Proposed Lead Plaintiffs as Lead Plaintiffs in the actions pursuant to the Private Securities Litigation Reform Act of 1995; and (iii) approving Movants' selection of Co-Lead Counsel.

Dated: April 2, 2004

Respectfully submitted,

GILMAN AND PASTOR, LLP

By: /s/David Pastor

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